

REMARKS

This amendment responds to the Office action dated August 30, 2007.

The examiner has rejected claims 1-10, 12-16 and 18 under 35 U.S.C. §103(a) as being unpatentable over Winder et al., U.S. Patent Publication No. 2004/0252759 A1, hereinafter Winder et al, in view of Trifanov et al, U.S Patent No. 6,950,211 B2, hereinafter Trifanov.

Claims 1, 4, 13, 18 and 20 have been amended to more clearly claim a dither pattern array that is an additive image pattern that is used to remove or prevent contouring and other artifacts from an image. This qualification is added to more clearly define the type of dither pattern claimed in these embodiments. Claims 2-3, 5-10, 12 and 14-16 are dependent claims, which comprise all the elements of the independent claims on which they depend and are patentable for the reasons stated for their independent claims.

The examiner cites Winder et al as teaching a method in which pixels are dispersed from other pixel values. Winder et al teach a method of interpolating between frames in a video sequence to create an intermediate video frame. The methods of Winder et al do not teach any form of dither pattern array or any type of dispersion pattern for creating a noise image. On the contrary, Winder et al teach a method of generating a visible image, which is very different from a high-pass dither pattern, which has no function as a viewable object, but is instead applied to an image to break up low-frequency areas. Winder et al do not teach a repellent function that is influenced by parts of a dither pattern array in other color channels, other parts of the same dither pattern tile or other temporal frames. The reference to temporal frames in Winder et al simply

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refers to a process of estimating an intermediate image between two temporal frames, which is absent any repellent function or dispersion.

The examiner relies on Trifanov to teach a repellent function, but refers to a Gaussian function that is used as a filter to remove Moire artifacts. However, the present claims describe a specific method of assigning values to pixels to create a dither pattern array using a repellent function that considers the presence of pixels in other color channels, other temporal frames and the current frame. This element is not taught in the combination of Winder et al and Trifanov.

The examiner has rejected claim 20 under 35 U.S.C. §103(a) as being unpatentable over Winder et al., U.S. Patent Publication No. 2004/0252759 A1, hereinafter Winder et al.

As stated above, this rejection fails to present a *prima facie* case of obviousness as Winder does not teach a repellent function that considers the presence of pixels in other color channels, other temporal frames and the current frame.

In light of the arguments above, all claims are considered to be novel, non-obvious and patentable in view of the cited art. The applicant respectfully requests that the examiner reconsider the rejections of these claims. The examiner is invited to contact applicant's attorney directly for any reason.

Respectfully submitted,

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